

**SHUTTLEWORTH & INGERSOLL, P.L.C.**  
 ATTORNEYS AT LAW      ESTABLISHED 1854

V.C. SHUTTLEWORTH 1900-1965  
 T.M. INGERSOLL 1902-1972

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 OF COUNSEL  
 THOMAS M. COLLINS  
 WILLIAM R. SHUTTLEWORTH

\* ADMITTED IN DC, MD AND VA ONLY  
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November 01, 2011

**VIA EMAIL** ([bradley@thevedacenter.com](mailto:bradley@thevedacenter.com); [courses@thevedacenter.com](mailto:courses@thevedacenter.com);  
[WillDalton@mac.com](mailto:WillDalton@mac.com))

Mr. Thom Knoles  
 The Veda Center  
 Vedic Meditation  
 2810 N 4th Street  
 Flagstaff, AZ 86004

Mr. Thom Knoles  
 Will Dalton Meditation  
 c/o William Dalton  
 1338 N. Laurel Ave., #104  
 West Hollywood, CA 90046

RE: False & Misleading Advertising

Dear Mr. Knoles:

We are again writing to you on behalf of our clients Maharishi Foundation, Ltd. and its affiliates and licensees (the "Foundation"), which owns all the rights in the United States to the registered service mark "Transcendental Meditation" (a copy of the federal registration is attached to this letter) and promotes, through authorized licensees, the teachings of the Transcendental Meditation® program. The purpose of this letter is to place you on notice of the following false and/or misleading statements that appear on your Vedic Meditation websites, [www.thomknoles.com](http://www.thomknoles.com) and [www.thevedacenter.com](http://www.thevedacenter.com) and which have otherwise been made by you and/or your agents:

MAILING ADDRESS: P.O. BOX 2107 CEDAR RAPIDS, IOWA 52406-2107  
 STREET ADDRESS: 115 THIRD STREET SE CEDAR RAPIDS, IOWA 52401  
 TELEPHONE 319.365.9461    FACSIMILE 319.365.8443    [WWW.SHUTTLEWORTHLAW.COM](http://WWW.SHUTTLEWORTHLAW.COM)

**EXHIBIT**

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1) You "learned Vedic Meditation from Maharishi Mahesh Yogi". This statement is false in several respects. You were taught the Transcendental Meditation® technique by Robert Cranston, in Washington, D.C., U.S.A. and initiated into the program on October 9, 1970. Moreover, neither Maharishi Mahesh Yogi nor the organization which teaches his programs worldwide have ever taught a technique called "Vedic Meditation." This is a term that you coined for your meditation technique, and it is false advertising for you to equate your program with the meditation technique founded by Maharishi Mahesh Yogi, *i.e.* the Transcendental Meditation® technique. We recognize your veiled attempt to mislead consumers into believing that your Vedic Meditation program is the same as the Transcendental Meditation® technique. In addition to violating the U.S. Lanham Act and the Australian Competition and Consumer Act of 2010 with your false advertising, you are infringing the Foundation's Transcendental Meditation® trademark in violation of §32 of the U.S. Lanham Act and §120 of the Australian Trade Marks Act.

2) You "became an acclaimed teacher of yoga and meditation before the age of twenty." Our records indicate that you were 20 years old when you completed the initial training as a teacher of the Transcendental Meditation® technique in December 1972 in La Antilla, Spain. Whatever acclaim you profess would not, therefore, have been possible to obtain before turning 20 years old. To ease your recollection and remind you of your commitments, I've attached a copy of the agreement that you signed after completing your training in 1972, in which you agreed to hold the teachings of the Transcendental Meditation® technique in trust for Student International Meditation Society (SIMS) (the predecessor in interest to the Foundation) and never teach such program except as a teacher of SIMS

3) You "received an honorary doctorate, 'Doctor of Science of Creative Intelligence' (D.Sci) in 1978". There is no record of you having ever received such a distinction. Maharishi European Research Institute (MERI) awarded the first doctorate in 1979 to another individual. It was several years later before another degree was awarded.

4) You "co-founded and co-managed a meditation-inspired private high school in Sydney." The Australian organization advises us that you were not involved in founding or managing Maharishi School of the Age of Enlightenment in Cremorne, Sydney, in the early 1980s or at anytime. You may have taught the Transcendental Meditation® program in the building that housed the school, but you did not participate in the school's functioning.

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5) You and other Vedic Meditation teachers are utilizing scientific research on the Transcendental Meditation program® as evidence of Vedic Meditation's efficacy.<sup>1</sup> There is no factual or legal basis for comparing the respective meditation techniques in such a manner. The Foundation lacks the ability to exercise quality control over your Vedic Meditation technique, therefore, as a matter of trademark law and fact, the respective meditation techniques are not the same. There is also no scientific support in any of the studies on the Transcendental Meditation® technique that the results of the studies can be found by practicing any other meditation technique, let alone Vedic Meditation. You and your teachers are deceiving the public with unsubstantiated and false claims of health benefits in violation of the U.S. Lanham Act and the Australian Competition and Consumer Act of 2010.

6) Further, we have information that you and teachers of Vedic Meditation directly state that Vedic Meditation and the Transcendental Meditation technique are the same. This is confirmed by the fact that you and your teachers are making the same misleading comparisons between Vedic Meditation and the Transcendental Meditation® programs. You are, therefore, directly infringing and inducing your teachers to infringe the Foundation's trademarks by suggesting to them and the public that the respective meditation techniques are the same. This constitutes direct and contributory trademark infringement in violation of §32 of the U.S. Lanham Act and §120 of the Australian Trade Marks Act. It is also would be a contractual violation of your teacher training agreement to in fact teach or utilize the proprietary teaching which you admittedly first received in such training except as provided by the authorized organization. In other words, you can not in fact teach, or represent you teach the Transcendental Meditation technique by that or any other name as a matter of statutory and contractual law.

You should note that the penalties for statutory violations of the Lanham Act section 32 are treble damages and attorney's fees.

We demand that you and your agents and teachers immediately cease and desist:

- (i) Associating your meditation program or Vedic Meditation with the meditation technique or programs developed or taught by Maharishi Mahesh Yogi and coined the Transcendental Meditation® program,

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<sup>1</sup> <http://www.londonmeditationcentre.com/benefits-of-meditation/>  
<http://www.newyorkmeditationcenter.com/benefits-of-meditation/>  
<http://themeditationhouse.com/vedic-meditation/>  
<http://www.ultimatemeditation.com.au/meditations-benefits.html>  
<http://www.richardstables.com/id13.html>

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- (ii) Using research conducted on the Transcendental Meditation program as evidence of the efficacy of programs you, or those you have instructed, teach;
- (iii) Holding yourself out as a doctor or using any other title which implies having received an honorary doctorate from MERU;
- (iv) All of the above false and misleading statements on your website and in any other material or publications where the false statements appear; and
- (v) Stating, inducing others or indicating in any way, directly or indirectly, that you or those you teach, teach the Transcendental Meditation program or a substantially similar program, or teaching the Transcendental Meditation program by that or any name.
- (vi) We also demand that you prominently and conspicuously place on the webpage where the false and misleading statements appear a corrective statement retracting the false statements and an apology for having mislead consumers about your credentials; and, we further demand, that you instruct all of your Vedic Meditation teachers to immediately cease and desist using scientific research on the Transcendental Meditation® technique for their own commercial gain and misleading the public by improperly comparing the respective meditation techniques.

If you can substantiate any of your claims contrary to what we learned from our sources, you should submit that documentation to us. Otherwise, we expect that you will comply with the above demands on or before November 7, 2011 or contact the undersigned before that date and confirm that you are in the process of complying with our demands.

Sincerely,



JASON R. SYTSMA  
jrs@shuttleworthlaw.com

JRS:dlr  
Enc.

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January 5, 2012

The Veda Center  
 Attention: Charlie Knoles  
 Vedic Meditation  
 2810 N 4th Street  
 Flagstaff, AZ 86004

**VIA EMAIL**  
 (charlie@thevedacenter.com)

RE: False & Misleading Advertising

Dear Mr. Knoles:

This is a follow up to correspondence sent to Mr. Thom Knoles and The Veda Center on November 1, 2011 concerning several false and misleading statements made in commercial advertising. You responded, on behalf of The Veda Center, five weeks ago indicating that you were seeking advice from legal counsel and that we could expect a response in 2-3 weeks. Several weeks have passed and we have yet to receive a response or an acknowledgement from your legal counsel that a response is forthcoming. This gives us the impression that you are not taking our demands seriously, which leaves us no alternative but to seek legal recourse.

Our client has authorized us to file a Complaint in federal court to resolve this dispute. The purpose of this correspondence is to determine whether that will be necessary. To avoid litigation, Thom Knoles and the Veda Center must consent to the demands made in the November 1, 2011 letter or respond to the November 1, 2011 letter through legal counsel before January 10, 2012.

Sincerely,

JASON R. SYTSMA  
 jrs@shuttleworthlaw.com